

# JOHNSON ROAD WAREHOUSE PROJECT

TOWN OF APPLE VALLEY, SAN BERNARDINO COUNTY, CALIFORNIA

## Delineation of State and Federal Jurisdictional Waters

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October 2024

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The undersigned certify that the statements furnished in this report and exhibits present data and information required for this biological evaluation, and the facts, statements, and information presented is a complete and accurate account of the findings and conclusions to the best of our knowledge and beliefs.



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Travis J. McGill  
Biologist/Director



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Thomas J. McGill, Ph.D.  
Managing Director

October 2024

# Executive Summary

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ELMT Consulting (ELMT) has prepared this Delineation of State and Federal Jurisdictional Waters Report for the Johnson Road Warehouse Project (Project site or site) located in the Town of Apple Valley, San Bernardino County, California. The jurisdictional delineation documents the regulatory authority of the U.S. Army Corps of Engineers (Corps), the Regional Water Quality Control Board (Regional Board), and the California Department of Fish and Wildlife (CDFW) pursuant to Section 401 and 404 of the Federal Clean Water Act (CWA), the California Porter-Cologne Water Quality Control Act, and Sections 1600 *et seq.* of the California Fish and Game Code.<sup>1</sup>

Two ephemeral drainages, named Drainage 1 and Drainage 2, were observed passing from the eastern boundary through the site and out through the western boundary of the project site during the field delineation. The drainages onsite flow into a storm drain that extends under Johnson Road and into detention basins associated with the Distribution Ceter south of the project site.

The onsite ephemeral drainage features are not relatively permanent, standing, or continuously flowing bodies of water and, therefore, will not qualify as waters of the United States under the regulatory authority of the Corps (*Sackett v. EPA* (2022) 143 S. Ct. 1322, 1336). However, the onsite drainage features will likely qualify as waters of the State and fall under the regulatory authority of the Regional Board and CDFW. Table ES-1 identifies the on-site jurisdictional including the total acreage of jurisdiction for each regulatory agency within the boundaries of the project site.

**Table ES-1: Jurisdictional Areas**

Jurisdictional Feature	Stream Flow	Cowardin Class	Class of Aquatic Resource	Regional Board Jurisdiction		CDFW Jurisdiction	
				Acreage	Linear Feet	Acreage	Linear Feet
Drainages 1	Ephemeral	Riverine	Non-Section 10 Non-Wetland	0.40	2,663	0.40	2,663
Drainages 2	Ephemeral	Riverine	Non-Section 10 Non-Wetland	0.20	1,247	0.20	1,247
<b>TOTALS</b>				<b>0.60</b>	<b>3,910</b>	<b>0.60</b>	<b>3,910</b>

Approximately 0.60 acres (3,910 linear feet) of non-wetland waters of the State occur on-site under the jurisdictional authority of the Regional Board. Likewise, the on-site drainage features exhibit characteristics consistent with CDFW’s methodology and would be considered CDFW streambed totaling 0.60 acres (3,910 linear feet).

Impacts to the on-site jurisdictional areas will require a Corps Approved Jurisdictional Determination or Waiver, Regional Board CWA Section Report of Waste Discharge, and a CDFW Section 1602 Lake and Streambed

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<sup>1</sup> The field surveys for this jurisdictional delineation were conducted on February 12, 2024 pursuant to the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region, Version 2.0* (Corps 2008); and *Minimum Standards for Acceptance of Aquatic Resources Delineation Reports* (Corps 2017); *The MESA Field Guide: Mapping Episodic Stream Activity* (CDFW 2014); and a *Review of Stream Processes and Forms in Dryland Watersheds* (CDFW 2010).

Alteration Agreement prior to Project implementation. Refer to Sections 1-7 for a detailed analysis of site conditions and regulatory requirements.

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# Section 1 Introduction

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This jurisdictional delineation has been prepared for the Johnson Road Warehouse Project (Project site or site) in order to document the potential jurisdictional authority of the U.S. Army Corps of Engineers (Corps), the Regional Water Quality Control Board (Regional Board), and the California Department of Fish and Wildlife (CDFW) pursuant to Section 401 and 404 of the Federal Clean Water Act (CWA), the California Porter-Cologne Water Quality Control Act and Sections 1600 *et seq.* of the California Fish and Game Code. The analysis presented in this report is supported by field surveys and verification of site conditions conducted on September 24, 2024.

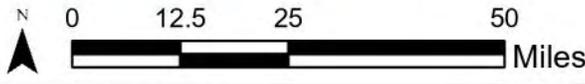
This jurisdictional delineation explains the methodology undertaken by ELMT Consulting (ELMT) to define the regulatory authority of regulatory authority of the U.S. Army Corps of Engineers (Corps), the Regional Water Quality Control Board (Regional Board), and the California Department of Fish and Wildlife (CDFW) and documents the findings made by ELMT. This report documents the jurisdictional boundaries using the most up-to-date regulations, written policy, and guidance from the regulatory agencies.

## 1.1 PROJECT LOCATION

The project site is generally located south and east of Interstate 15, west of State Route 247, and north of State Route 18 in the Town of Apple Valley, San Bernardino County, California (Exhibit 1, *Regional Vicinity*). The site is depicted on the Apple Valley North quadrangle of the United States Geological Survey's (USGS) 7.5-minute map series within Section 16 of Township 6 North, Range 3 West (Exhibit 2, *Site Vicinity*). Specifically, the approximately 20 acre site is located south of Quarry Road, east of Dachshund Avenue, bound to the south by Johnson Road, and bound to the east by Navajo Road; and is located within Assessor Parcel Numbers (APNs) 0463-213-26, -27, and -28 (Exhibit 3, *Project Site*).

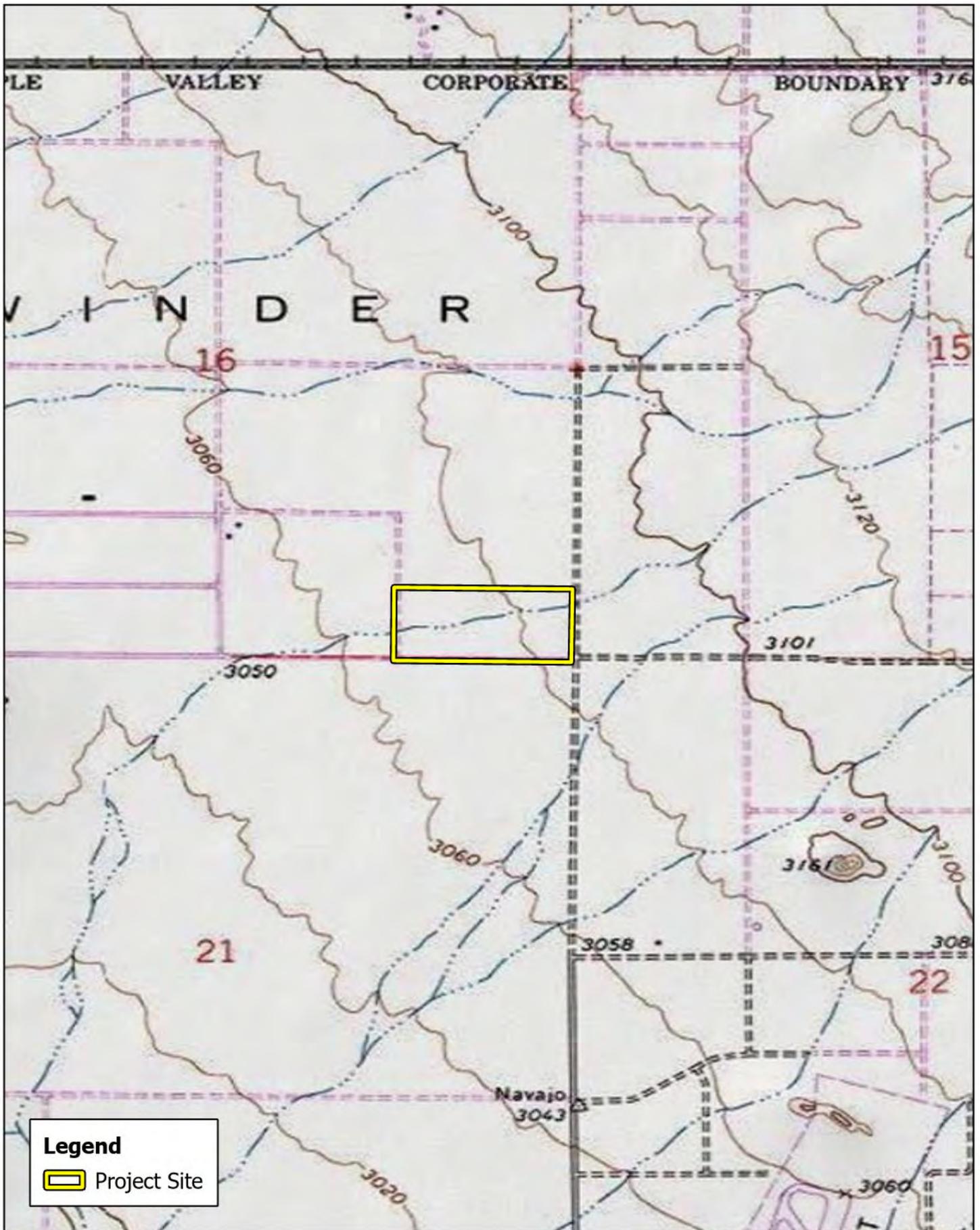
## 1.2 PROJECT DESCRIPTION

The project proposes to construct a single industrial warehouse building that encompass approximately 410,241 square feet on approximately 20 acres. The development will consist of structures to accommodate the proposed use in addition to accessory structures, loading docks, truck trailer parking, automobile parking, and associated infrastructure improvements. Refer to Appendix D, *Site Plan*.



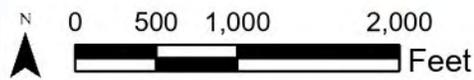
Source: ESRI World Street Map

JOHNSON ROAD WAREHOUSE PROJECT  
**Regional Vicinity**



JOHNSON ROAD WAREHOUSE PROJECT

# Site Vicinity



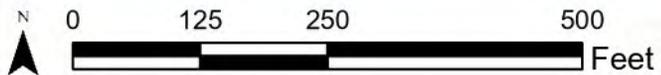
Source: USA Topo Maps, San Bernardino County



**Johnson Road**

**Legend**

 Project Site



Source: ESRI Aerial Imagery, San Bernardino County

JOHNSON ROAD WAREHOUSE PROJECT

**Project Site**

Exhibit 3

## Section 2 Regulations

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There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The Corps Regulatory Division regulates activities pursuant to Section 404 of the CWA, Section 10 of the Rivers and Harbors Act, and Section 103 of the Marine Protection, Research, and Sanctuaries Act. The Regional Board regulates activities pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act and the CDFW regulates activities under Sections 1600 *et seq.* of the California Fish and Game Code.

### 2.1 U.S. ARMY CORPS OF ENGINEERS

In accordance with the Revised Definition of “Waters of the United States”; Conforming (September 8, 2023), “waters of the United States” are defined as follows:

(a) *Waters of the United States* means:

(1) Waters which are:

- (i) Currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
- (ii) The territorial seas; or
- (iii) Interstate waters;

(2) Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under [paragraph \(a\)\(5\)](#) of this section;

(3) Tributaries of waters identified in paragraph (a)(1) or (2) of this section that are relatively permanent, standing or continuously flowing bodies of water;

(4) Wetlands adjacent to the following waters:

- (i) Waters identified in [paragraph \(a\)\(1\)](#) of this section; or
- (ii) Relatively permanent, standing or continuously flowing bodies of water identified in paragraph (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;

(5) Intrastate lakes and ponds not identified in paragraphs (a)(1) through (4) of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in paragraph (a)(1) or (a)(3) of this section

(b) The following are not “waters of the United States” even where they otherwise meet the terms of [paragraphs \(a\)\(2\)](#) through [\(5\)](#) of this section:

(1) Waste treatment systems, including treatment ponds or lagoons, designed to meet the requirements of the Clean Water Act;

(2) Prior converted cropland designated by the Secretary of Agriculture. The exclusion would cease upon a change of use, which means that the area is no longer available for the production of agricultural commodities. Notwithstanding the determination of an area's status as prior converted cropland by any other Federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with EPA;

(3) Ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water;

(4) Artificially irrigated areas that would revert to dry land if the irrigation ceased;

(5) Artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;

(6) Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;

(7) Waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States; and

(8) Swales and erosional features (*e.g.*, gullies, small washes) characterized by low volume, infrequent, or short duration flow.

(c) In this section, the following definitions apply:

(1) **Wetlands** means those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

(2) **Adjacent** means having a continuous surface connection

(3) **High tide line** means the line of intersection of the land with the water's surface at the maximum height reached by a rising tide. The high tide line may be determined, in the absence of actual data, by a line of oil or scum along shore objects, a more or less continuous deposit of fine shell or debris on the foreshore or berm, other physical markings or characteristics, vegetation lines, tidal gages, or other suitable means that delineate the general height reached by a rising tide. The line encompasses spring high tides and other high tides that occur with periodic frequency but does not include storm surges in which there is a departure from the normal or predicted reach of the tide due to the piling up of water against a coast by strong winds such as those accompanying a hurricane or other intense storm.

(4) **Ordinary high water mark** means that line on the shore established by the fluctuations of water and indicated by physical characteristics such as clear, natural line impressed on the bank, shelving, changes

in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.

(5) ***Tidal waters*** means those waters that rise and fall in a predictable and measurable rhythm or cycle due to the gravitational pulls of the moon and sun. Tidal waters end where the rise and fall of the water surface can no longer be practically measured in a predictable rhythm due to masking by hydrologic, wind, or other effects.

## 2.2 REGIONAL WATER QUALITY CONTROL BOARD

Pursuant to Section 401 of the CWA, any applicant for a federal license or permit to conduct any activity which may result in any discharge to waters of the United States must provide certification from the State or Indian tribe in which the discharge originates. This certification provides for the protection of the physical, chemical, and biological integrity of waters, addresses impacts to water quality that may result from issuance of federal permits and helps ensure that federal actions will not violate water quality standards of the State or Indian tribe. In California, there are nine Regional Boards that issue or deny certification for discharges to waters of the United States and waters of the State, including wetlands, within their geographical jurisdiction. The State Water Resources Control Board (SWRCB) assumes this responsibility when a project has the potential to result in the discharge to waters within multiple Regional Boards.

Additionally, the California Porter-Cologne Water Quality Control Act gives the State very broad authority to regulate waters of the State, which are defined as any surface water or groundwater, including saline waters. The Porter-Cologne Water Quality Control Act has become an important tool post *Solid Waste Agency of Northern Cook County vs. United States Corps of Engineers*<sup>2</sup> (SWANCC) and *Rapanos v. United States*<sup>3</sup> (Rapanos) court cases with respect to the State's regulatory authority over isolated and insignificant waters. Generally, any applicant proposing to discharge waste into a water body must file a Report of Waste Discharge in the event that there is no Section 404/401 nexus. Although "waste" is partially defined as any waste substance associated with human habitation, the Regional Board also interprets this to include discharge of dredged and fill material into water bodies.

Under the State Water Resources Control Board State Wetland Definition, an area is a wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.

## 2.3 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Sections 1600 *et seq.* of the California Fish and Game Code establishes a fee-based process to ensure that projects conducted in and around lakes, rivers, or streams do not substantially adversely impact fish and wildlife resources, or, when adverse impacts cannot be avoided, ensures that adequate mitigation and/or

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<sup>2</sup> Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers, 531 U.S. 159 (2001)

<sup>3</sup> Rapanos v. United States, 547 U.S. 715 (2006)

compensation is provided. Pursuant to Section 1602 of the California Fish and Game Code, a notification must be submitted to the CDFW for any activity that will divert or obstruct the natural flow or alter the bed, channel, or bank (which may include associated biological resources) of a river or stream or use material from a streambed. One CDFW guidance document, although not a formally adopted rule or policy, requires notification for activities taking place within rivers or streams that flow perennially or episodically and that are defined by the area in which surface water currently flows, or has flowed, over a given course during the historic hydrologic regime, and where the width of its course can reasonably be identified by physical and biological indicators. If the project will not “substantially adversely affect an existing fish or wildlife resource,” following notification to CDFW, the project may commence without an agreement with CDFW. (Fish & G. Code, § 1602(a)(4)(A)(i).)

## Section 3 Methodology

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The analysis presented in this report is supported by field surveys and verification of site conditions conducted on September 24, 2024. ELMT conducted a field delineation to determine the jurisdictional limits of the “waters of the United States”, “waters of the State” and jurisdictional streambed (including potential wetlands), located within the boundaries of the Project site. While in the field, jurisdictional features were recorded on an aerial base map at a scale of 1" = 50' using topographic contours and visible landmarks as guidelines. Data points were obtained with a Garmin Map62 Global Positioning System to record and identify specific widths for ordinary high water mark (OHWM) indicators and the locations of photographs, soil pits, and other pertinent jurisdictional features, if present. This data was then transferred as a .shp file and added to the Project's jurisdictional exhibits. The jurisdictional exhibits were prepared using ESRI ArcInfo Version 10 software.

### 3.1 WATERS OF THE UNITED STATES

In the absence of adjacent wetlands, the limits of the Corps jurisdiction in non-tidal waters extend to the OHWM, which is defined as “. . . *that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.*”<sup>4</sup> Indicators of an OHWM are defined in *A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States* (Corps 2008). In addition to characteristics listed above, wracking; vegetation matted down, bent, or absent; sediment sorting; leaf litter disturbed or washed away; scour; deposition; multiple observed flow events; bed and banks; water staining; and/or change in plant community.

Pursuant to the Corps Wetland Delineation Manual (Corps 1987), the identification of wetlands is based on a three-parameter approach involving indicators of hydrophytic vegetation, hydric soils, and wetland hydrology. In order to qualify as a wetland, a feature must exhibit at least minimal characteristics within each of these three parameters. It should also be noted that both the Regional Board and CDFW follow the methods utilized by the Corps to identify wetlands. For this Project, Corps jurisdictional wetlands are delineated using the methods outlined in the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region, Version 2.0* (Corps 2008).

### 3.2 WATERS OF THE STATE

#### 3.2.1 REGIONAL WATER QUALITY CONTROL BOARD

The California *Porter-Cologne Water Quality Control Act* gives the Regional Board very broad authority to regulate waters of the State, which are defined as any surface water or groundwater, including saline

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<sup>4</sup> CWA regulations 33 CFR §328.3(e).

waters. The Regional Board shares the Corps' methodology for delineating the limits of jurisdiction based on the identification of OHWM indicators and utilizing the three parameter approach for wetlands.

### **3.2.2 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE**

Sections 1600 *et seq.* of the California Fish and Game Code applies to all perennial, intermittent, and ephemeral rivers, streams, and lakes in the State. CDFW Regulations define "stream" as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and that supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation." (14 Cal. Code Regs., § 1.72.) For this Project location, CDFW jurisdictional limits were delineated using this definition of "stream."

## Section 4 Literature Review

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ELMT conducted a thorough review of relevant literature and materials to preliminarily identify areas that may fall under the jurisdiction of the regulatory agencies. A summary of materials utilized during ELMT's literature review is provided below and in Appendix A, *Documentation*. In addition, refer to Section 8 for a complete list of references used throughout the course of this delineation.

### 4.1 WATERSHED REVIEW

The project site is located near the middle of the southern portion of the Mojave Watershed (HUC 18090208). The Mojave Watershed is a large, closed basin in the western Mojave Desert that occurs within central and western San Bernardino County and drains approximately 4,500 square miles. The primary geographic and hydrologic feature of the Mojave Watershed is the Mojave River, which occurs approximately 9.8 miles to the west of the site. The headwaters of the Mojave River are in the San Bernardino Mountains, which annually receives greater than forty inches of precipitation at its highest elevations. Much of the winter precipitation in the San Bernardino Mountains falls in the form of snow, which provides spring recharge to the Mojave River system. This results in an annual recharge to the Mojave River of approximately 75,000 acre-feet. The Mojave River transects the watershed north and east to its terminus at Silver Lake, just north of the Community of Baker. South of Mojave Forks Dam, the Mojave River is fed by the West Fork Mojave River to the west, which also forms the Mojave River Forks Reservoir, and Deep Creek to the east. Elevations within the watershed range from 8,500 feet above mean sea level at Butler Peak in the San Bernardino Mountains to 1,400 feet above mean sea level at Afton Canyon near the terminus of the Mojave River. There are multiple intermittent or ephemeral waterways in the eastern portion of the watershed which convey surface water runoff to Silver Lake during extreme rain events. Silver Lake remains dry most of the year. Aside from extreme rain events, the Mojave River channel is typically dry downstream of the Mojave Forks Dam, except in certain locations where groundwater is forced to the surface by geologic influences.

### 4.2 LOCAL CLIMATE

The Mojave Desert is found at elevations of 2,000 to 5,000 feet above mean sea level (msl) and is characterized by cool winter temperatures and warm summer temperatures, with its rainfall occurring almost entirely in the winter. Climatological data obtained from nearby weather stations indicates the annual precipitation in Apple Valley averages 20.2 inches per year. Almost all of the precipitation occurs November through April, with hardly any occurring between May and October. The wettest month of February, with a monthly average total of 4.3 inches. The average maximum and minimum temperatures for Apple Valley are 88- and 55-degrees Fahrenheit (°F), respectively with July being the hottest month and December being the coldest. Temperatures during the site visits were in the mid-70's to low-80's (degrees Fahrenheit) with light winds and little to no cloud cover.

### 4.3 USGS TOPOGRAPHIC QUADRANGLE

The USGS 7.5 Minute Series Topographic Quadrangle maps show geological formations and their characteristics, describing the physical setting of an area through contour lines and major surface features

including lakes, rivers, streams, buildings, landmarks, and other factors that may fall under an agency's jurisdiction. Additionally, the maps depict topography through color and contour lines, which are helpful in determining elevations and latitude and longitude within the project site.

According to the topographic map, the project site occurs within the Apple Valley North 7.5-minute quadrangle. The site consists of undeveloped land with a significantly disturbed area in the southern portion of the site associated with vehicular use as a turnaround and shoulder area alongside Johnson Road.

On-site elevation is relatively flat and ranges from approximately 3,076 to 3,096 feet above mean sea level, sloping marginally from northeast to southwest.

#### **4.4 AERIAL PHOTOGRAPHS**

Prior to conducting the field delineation, ELMT reviewed current and historical aerial photographs (1985-2023) of the project as available from Google Earth Pro Imaging. Aerial photographs can be useful during the delineation process, as they often indicate the presence of drainage features and riverine habitat within the boundaries of the project site, if any.

The project site is located in a predominantly undeveloped area, in the northeastern limits of the Town of Apple Valley. Limited residential parcels and industrial development are scattered throughout the area. Notable developments in the vicinity include Quarry Road and an associated railroad located adjacent to the northern boundary of the site, Apple Valley Speedway located approximately 1.67 miles to the northeast, Apple Valley Airport located approximately 0.8 miles to the southeast, and a Walmart distribution center located south and across Johnson Road.

The survey area supports a mix of undeveloped and disturbed land. The areas on the perimeter of the project site are marginally disturbed with the presence of dirt access roads. The central portion of the site is relatively undisturbed, while the southern portion of the site is highly disturbed due to use as a truck pull off area. Refer to Appendix A, *Site Photographs*, for representative site photographs. The project site has undergone minimal changes since 1985.

#### **4.5 SOILS**

Soils within and adjacent to the Project site were researched prior to the field delineation using the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Custom Soil Resource Report for San Bernardino County, Mojave River Area. Soil surveys furnish soil maps and interpretations originally needed in providing technical assistance to farmers and ranchers; in guiding other decisions about soil selection, use, and management; and in planning, research, and disseminating the results of the research. In addition, soil surveys are now heavily utilized in order to obtain soil information with respect to potential wetland environments and jurisdictional areas (i.e., soil characteristics, drainage, and color).

According to the USDS Web Soil Survey the project site is entirely underlain by Helendale-Bryman loamy sands (2 to 5 percent slopes). Soils within the southern area of the project site have been compacted by

heavy disturbance associated with vehicle use, while soils in the remaining areas of the project site are relatively undisturbed. Refer to Exhibit 4, *Soils*.

#### **4.6 HYDRIC SOILS LIST OF CALIFORNIA**

ELMT reviewed the USDA NRCS Hydric Soils List of California in an effort to verify whether on-site soils are considered to be hydric<sup>5</sup>. It should be noted that lists of hydric soils along with soil survey maps provide off-site ancillary tools to assist in wetland determinations, but they are not a substitute for field investigations. The presence of hydric soils is initially investigated by comparing the mapped soil series for the site to the County list of hydric soils. According to the hydric soils list, Helendale-Bryman loamy sands (2 to 5 percent slopes) have not been listed as hydric in San Bernardino County Mojave River Area.

#### **4.7 NATIONAL WETLANDS INVENTORY**

ELMT reviewed the U.S. Fish and Wildlife Service's (USFWS) National Wetland Inventory maps. No riverine resources are mapped within the boundaries of the project site, The NWI mapping for this area was photo interpreted using 1 meter (or less) digital, true color imagery from 2012. Refer to Appendix B, *Documentation*.

#### **4.8 FLOOD ZONE**

The Federal Emergency Management Act (FEMA) website was searched for flood data for the project site. Based on Flood Insurance Rate Maps No. 06071C5830H, the project site is located within Zone D – areas of undetermined flood hazard.

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<sup>5</sup> A hydric soil is a soil that formed under conditions of saturation, flooding or ponding long enough during the growing season to develop anaerobic conditions in the upper part.



## Section 5 Site Conditions

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ELMT biologist Andrew N. Mestas conducted a field delineation on September 24, 2024, to verify existing site conditions and document the extent of potential jurisdictional areas within the boundaries of the project site. ELMT field staff encountered no limitations during the field delineation.

The project site is composed of primarily undeveloped land with a low degree of disturbance. Onsite disturbance consists of vehicular use along the southern boundary associated with Johnson Road. Undisturbed areas onsite support a creosote-bush scrub plant community.

### 5.1 ON-SITE FEATURES

#### 5.1.1 DRAINAGE FEATURES

Two (2) ephemeral drainage features were observed on the project site during the field delineation. ELMT carefully assessed the site for depressions, inundation, presence of hydrophytic vegetation, staining, cracked soil, ponding, and indicators of active surface flow and corresponding physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris. Suspected jurisdictional areas were checked for the presence of definable channels, soils, and hydrology. Two drainages (Drainage 1, and 2) occurring within the site boundaries were mapped based on such physical characteristics. Refer to Exhibit 5, *Jurisdictional Areas*.

The onsite drainage features generally flow in a northeast to southwest direction across the project site. No surface water was present within the drainage features during the site visit; however, evidence of an OHWM and bed and bank were observed via scour, changes in substrate, shelving, and lack of vegetation within all of onsite features. Across all of the drainage features, the OHWM ranged from approximately 2-10 feet in width throughout the length of the drainages. These features only convey surface flow in direct response to precipitation, and do not support riparian vegetation.

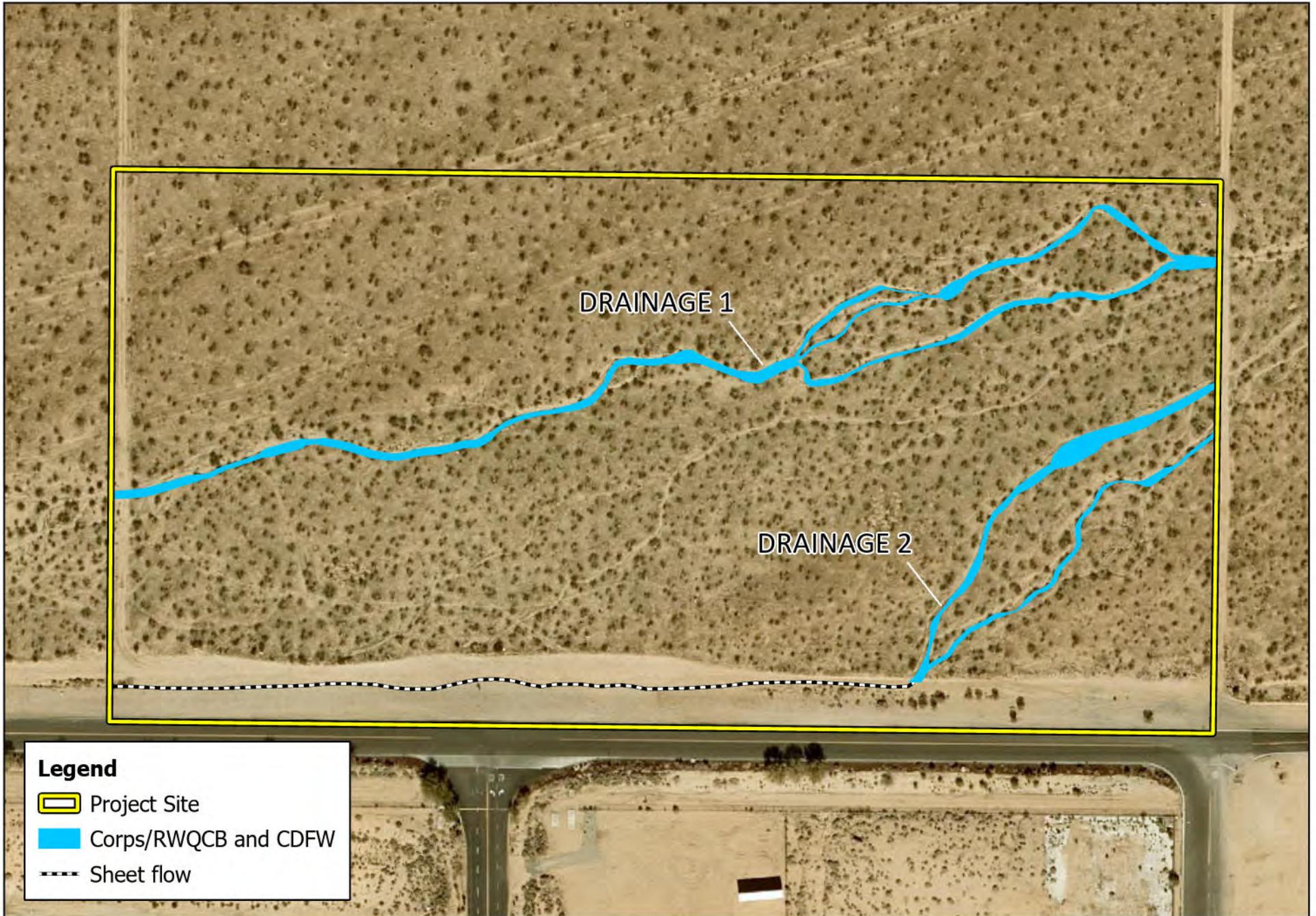
The onsite drainage features primarily consisted of sandy substrate consisting of loose sandy soils and small cobble with minimal vegetation. The banks of the drainage features were vegetated with upland plant species indicative of the surrounding *Larrea Tridentata* Shrubland Alliance (Creosote Bush Scrub).

The onsite drainage features eventually flow offsite to the southwest and terminate at the Walmart Distribution Center south of Johnson Road. The onsite drainage features do not have a surface hydrologic connection to downstream waters of the United States; however, the onsite drainages will fall under the regulatory authority of the Regional Board as waters of the State, and, CDFW as jurisdictional streambed.

#### 5.1.2 WETLAND FEATURES

In order to qualify as a wetland, a feature must exhibit all three wetland parameters (i.e., vegetation, soils, and hydrology) described in the Corps Arid West Regional Supplement. Although evidence of hydrology (i.e., scour, changes in substrate, lack of vegetation) was present within the on-site drainages, these areas were dominated by upland plant species. Further, water does not persist long enough on the Project site to

create hydric soil (anaerobic) conditions, and none of the on-site drainages supported a dominance of hydrophytic vegetation. As a result, no features on-site meet the Corps' or Regional Board's wetland definition to qualify as jurisdictional wetlands.



**Legend**

-  Project Site
-  Corps/RWQCB and CDFW
-  Sheet flow



Source: ESRI Aerial Imagery, San Bernardino County

JOHNSON ROAD WAREHOUSE PROJECT  
**Jurisdictional Areas**

# Section 6 Findings

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This report presents the extent of jurisdictional features using the most up-to-date regulations, written policy, and guidance from the regulatory agencies. Please refer to the following sections for a summary of jurisdictional areas within the Project site.

## 6.1 U.S. ARMY CORPS OF ENGINEERS DETERMINATION

### 6.1.1 WATERS OF THE UNITED STATES DETERMINATION

The onsite ephemeral drainage features are not relatively permanent, standing, or continuously flowing bodies of water and, therefore, will not qualify as waters of the United States under the regulatory authority of the Corps (*Sackett v. EPA* (2022) 143 S. Ct. 1322, 1336).

### 6.1.2 FEDERAL WETLAND DETERMINATION

An area must exhibit all three wetland parameters described in the Corps Arid West Regional Supplement to be considered a jurisdictional wetland. Based on the results of the field delineation, it was determined that no areas within the Project site met all three wetland parameters. Therefore, no jurisdictional wetland features exist within the Project site.

## 6.2 REGIONAL WATER QUALITY CONTROL BOARD

### 6.2.1 WATERS OF THE STATE DETERMINATION

The on-site drainage features exhibit characteristics consistent with the Regional Board’s methodology and will therefore be considered jurisdictional waters of the State. Approximately 0.6 acre (3,910 linear feet) of non-wetland waters of the State occur on-site.

**Table 1: Regional Board Jurisdictional Areas**

Jurisdictional Features	Regional Board Jurisdictional Streambed	
	On-Site Jurisdiction acreage (linear feet)	Impacts acreage (linear feet)
Drainage 1	0.40	2,663
Drainage 2	0.20	1,247
<b>TOTALS</b>	<b>0.60</b>	<b>3,910</b>

## 6.2.2 STATE WETLAND DETERMINATION

Under the State Water Resources Control Board State Wetland Definition, an area is a wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.

Based on the results of the field delineation, it was determined that no areas within the Project site meet the State Wetland Definition. Therefore, no state wetland features exist within the Project site.

## 6.3 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

The on-site drainage features exhibit characteristics consistent with CDFW's methodology and are therefore considered CDFW streambed. Approximately 0.6 acre (3,910 linear feet) of CDFW jurisdiction was mapped within boundaries of the project site. Refer to Exhibit 5, *Jurisdictional Areas*, for an illustration of impacts to CDFW jurisdictional areas.

**Table 2: CDFW Jurisdictional Areas**

Jurisdictional Features	CDFW Jurisdictional Streambed	
	On-Site Jurisdiction acreage (linear feet)	Impacts acreage (linear feet)
Drainage 1	0.40	2,663
Drainage 2	0.20	1,247
<b>TOTALS</b>	<b>0.60</b>	<b>3,910</b>

## **Section 7      Regulatory Approval Process**

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The following is a summary of the various permits, certifications, and agreements that may be necessary prior to construction and/or alteration within jurisdictional areas. Ultimately the regulatory agencies make the final determination of jurisdictional boundaries and permitting requirements.

### **7.1      UNITED STATES ARMY CORPS OF ENGINEERS**

The Corps regulates discharges of dredged or fill materials into waters of the United States and wetlands pursuant to Section 404 of the CWA. No Corps jurisdictional areas were identified within the project site and a CWA Section 404 permit would not be required for the proposed project.

### **7.2      REGIONAL WATER QUALITY CONTROL BOARD**

The Regional Board regulates discharges to surface waters pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act. Regional Board jurisdictional areas were identified within the project site and a Report of Waste Discharge will be required for the proposed project for impacts to the onsite drainage features.

### **7.3      CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE**

Pursuant to Section 1602 of the California Fish and Game Code, the CDFW regulates any activity that will divert or obstruct the natural flow or alter the bed, channel, or bank (which may include associated biological resources) of a river or stream. CDFW jurisdictional areas were observed within the project site at the time of the investigation. Therefore, a Section 1602 Streambed Alteration Agreement from the CDFW will be required prior to project implementation.

## Section 8      References

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## **Appendix A      Site Photographs**

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**Photograph 1:** From the northeastern corner along the eastern boundary of the site looking west where Drainage 1 enters the project site.



**Photograph 2:** From the southwestern corner of the site looking east along Drainage 1 looking east where it exits the site.



**Photograph 3:** From the central portion of the site looking east along Drainage 1.



**Photograph 4:** From the central portion of the site looking east along Drainage 1.



**Photograph 5:** From the southern portion of the site looking along Drainage 2.



**Photograph 6:** From the central portion of the site looking west along Drainage 2.



**Photograph 7:** From the central portion of the site looking northwest along Drainage 2.



**Photograph 8:** From the central portion of the site looking north along Drainage 2.



**Photograph 9:** Looking at an offsite culvert to the east of the site where Drainage 1 and 2 flow into and under Johnson Road.

## **Appendix B      Documentation**

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September 23, 2024

### Wetlands

- |   |                                |   |                                   |   |          |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland       |  | Lake     |
|  | Estuarine and Marine Wetland   |  | Freshwater Forested/Shrub Wetland |  | Other    |
|   |                                |  | Freshwater Pond                   |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

## **Appendix C      Methodology**

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## WATERS OF THE UNITED STATES

### *Section 404 of the Clean Water Act*

In accordance with the Revised Definition of “Waters of the United States”; Conforming (September 8, 2023), “waters of the United States” are defined as follows:

(a) *Waters of the United States* means:

(1) Waters which are:

- (i) Currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
- (ii) The territorial seas; or
- (iii) Interstate waters;

(2) Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under [paragraph \(a\)\(5\)](#) of this section;

(3) Tributaries of waters identified in paragraph (a)(1) or (2) of this section that are relatively permanent, standing or continuously flowing bodies of water;

(4) Wetlands adjacent to the following waters:

- (i) Waters identified in [paragraph \(a\)\(1\)](#) of this section; or
- (ii) Relatively permanent, standing or continuously flowing bodies of water identified in paragraph (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;

(5) Intrastate lakes and ponds not identified in paragraphs (a)(1) through (4) of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in paragraph (a)(1) or (a)(3) of this section

(b) The following are not “waters of the United States” even where they otherwise meet the terms of [paragraphs \(a\)\(2\)](#) through [\(5\)](#) of this section:

(1) Waste treatment systems, including treatment ponds or lagoons, designed to meet the requirements of the Clean Water Act;

(2) Prior converted cropland designated by the Secretary of Agriculture. The exclusion would cease upon a change of use, which means that the area is no longer available for the production of agricultural commodities. Notwithstanding the determination of an area's status as prior converted cropland by any other Federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with EPA;

(3) Ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water;

- (4) Artificially irrigated areas that would revert to dry land if the irrigation ceased;
- (5) Artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;
- (6) Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;
  
- (7) Waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States; and
  
- (8) Swales and erosional features (e.g., gullies, small washes) characterized by low volume, infrequent, or short duration flow.

(c) In this section, the following definitions apply:

- (1) **Wetlands** means those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.
  
- (2) **Adjacent** means having a continuous surface connection
  
- (3) **High tide line** means the line of intersection of the land with the water's surface at the maximum height reached by a rising tide. The high tide line may be determined, in the absence of actual data, by a line of oil or scum along shore objects, a more or less continuous deposit of fine shell or debris on the foreshore or berm, other physical markings or characteristics, vegetation lines, tidal gages, or other suitable means that delineate the general height reached by a rising tide. The line encompasses spring high tides and other high tides that occur with periodic frequency but does not include storm surges in which there is a departure from the normal or predicted reach of the tide due to the piling up of water against a coast by strong winds such as those accompanying a hurricane or other intense storm.
  
- (4) **Ordinary high water mark** means that line on the shore established by the fluctuations of water and indicated by physical characteristics such as clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.
  
- (5) **Tidal waters** means those waters that rise and fall in a predictable and measurable rhythm or cycle due to the gravitational pulls of the moon and sun. Tidal waters end where the rise and fall of the water surface can no longer be practically measured in a predictable rhythm due to masking by hydrologic, wind, or other effects.

## WETLANDS

For this project location, Corps jurisdictional wetlands are delineated using the methods outlined in the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region, Version 2.0* (Corps 2008). This document is one of a series of Regional Supplements to the Corps Wetland Delineation Manual (Corps 1987). The identification of wetlands is based on a three-parameter approach involving indicators of hydrophytic vegetation, hydric soil, and wetland hydrology. In order to be considered a wetland, an area must exhibit at least minimal characteristics within these three (3) parameters. The Regional Supplement presents wetland indicators, delineation guidance, and other information that is specific to the Arid West Region. In the field, vegetation, soils, and evidence of hydrology are examined using the methodology listed below and documented on Corps wetland data sheets, when applicable. It should be noted that both the Regional Board and the CDFW jurisdictional wetlands encompass those of the Corps.

### Vegetation

Nearly 5,000 plant types in the United States may occur in wetlands. These plants, often referred to as hydrophytic vegetation, are listed in regional publications by the U.S. Fish and Wildlife Service (USFWS). In general, hydrophytic vegetation is present when the plant community is dominated by species that can tolerate prolonged inundation or soil saturation during growing season. Hydrophytic vegetation decisions are based on the assemblage of plant species growing on a site, rather than the presence or absence of particular indicator species. Vegetation strata are sampled separately when evaluating indicators of hydrophytic vegetation. A stratum for sampling purposes is defined as having 5 percent or more total plant cover. The following vegetation strata are recommended for use across the Arid West:

- ◆ *Tree Stratum*: Consists of woody plants 3 inches or more in diameter at breast height (DBH), regardless of height;
- ◆ *Sapling/shrub stratum*: Consists of woody plants less than 3 inches DBH, regardless of height;
- ◆ *Herb stratum*: Consists of all herbaceous (non-woody) plants, including herbaceous vines, regardless of size; and,
- ◆ *Woody vines*: Consists of all woody vines, regardless of size.

The following indicator is applied per the test method below.<sup>1</sup> Hydrophytic vegetation is present if any of the indicators are satisfied.

<sup>1</sup> Although the Dominance Test is utilized in the majority of wetland delineations, other indicator tests may be employed. If one indicator of hydric soil and one primary or two secondary indicators of wetland hydrology are present, then the Prevalence Test (Indicator 2) may be performed. If the plant community satisfies the Prevalence Test, then the vegetation is hydric. If the Prevalence Test fails, then the Morphological Adaptation Test may be performed, where the delineator analyzes the vegetation for potential morphological features.

### Indicator 1 – Dominance Test

Cover of vegetation is estimated and is ranked according to their dominance. Species that contribute to a cumulative total of 50% of the total dominant coverage, plus any species that comprise at least 20% (also known as the “50/20 rule”) of the total dominant coverage, are recorded on a wetland data sheet. Wetland indicator status in California (Region 0) is assigned to each species using the *National Wetland Plant List, version 2.4.0* (Corps 2012). If greater than 50% of the dominant species from all strata were Obligate, Facultative-wetland, or Facultative species, the criteria for wetland vegetation is considered to be met. Plant indicator status categories are described below:

- ◆ *Obligate Wetland (OBL)*: Plants that almost always occur in wetlands;
- ◆ *Facultative Wetland (FACW)*: Plants that usually occur in wetlands, but may occur in non-wetlands;
- ◆ *Facultative (FAC)*: Plants that occur in wetlands and non-wetlands;
- ◆ *Facultative Upland (FACU)*: Plants that usually occur in non-wetlands, but may occur in wetlands; and,
- ◆ *Obligate Upland (UPL)*: Plants that almost never occur in wetlands.
- ◆ *No Indicator (NI)*: Plant not listed on the Corps Wetland Plant List for the Arid West.

### **Hydrology**

Wetland hydrology indicators are presented in four (4) groups, which include:

#### Group A – Observation of Surface Water or Saturated Soils

Group A is based on the direct observation of surface water or groundwater during the site visit.

#### Group B – Evidence of Recent Inundation

Group B consists of evidence that the site is subject to flooding or ponding, although it may not be inundated currently. These indicators include water marks, drift deposits, sediment deposits, and similar features.

#### Group C – Evidence of Recent Soil Saturation

Group C consists of indirect evidence that the soil was saturated recently. Some of these indicators, such as oxidized rhizospheres surrounding living roots and the presence of reduced iron or sulfur in the soil profile, indicate that the soil has been saturated for an extended period.

### Group D – Evidence from Other Site Conditions or Data

Group D consists of vegetation and soil features that indicate contemporary rather than historical wet conditions, and include shallow aquitard and the FAC-neutral test.

If wetland vegetation criteria is met, the presence of wetland hydrology is evaluated at each transect by recording the extent of observed surface flows, depth of inundation, depth to saturated soils, and depth to free water in the soil test pits. The lateral extent of the hydrology indicators are used as a guide for locating soil pits for evaluation of hydric soils and jurisdictional areas. In portions of the stream where the flow is divided by multiple channels with intermediate sand bars, the entire area between the channels is considered within the OHWM and the wetland hydrology indicator is considered met for the entire area.

### **Soils**

A hydric soil is a soil that formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper 16-20 inches.<sup>2</sup> The concept of hydric soils includes soils developed under sufficiently wet conditions to support the growth and regeneration of hydrophytic vegetation. Soils that are sufficiently wet because of artificial measures are included in the concept of hydric soils. It should also be noted that the limits of wetland hydrology indicators are used as a guide for locating soil pits. If any hydric soil features are located, progressive pits are dug moving laterally away from the active channel until hydric features are no longer present within the top 20 inches of the soil profile.

Once in the field, soil characteristics are verified by digging soil pits along each transect to an excavation depth of 20 inches; in areas of high sediment deposition, soil pit depth may be increased. Soil pit locations are usually placed within the drainage invert or within adjoining vegetation. At each soil pit, the soil texture and color are recorded by comparison with standard plates within a *Munsell Soil Chart* (2009). Munsell Soil Charts aid in designating color labels to soils, based by degrees of three simple variables – hue, value, and chroma. Any indicators of hydric soils, such as organic accumulation, iron reduction, translocation, and accumulation, and sulfate reduction, are also recorded.

Hydric soil indicators are present in three groups, which include:

#### All Soils

“All soils” refers to soils with any United States Department of Agriculture (USDA) soil texture. Hydric soil indicators within this group include histosol, histic epipedon, black histic, hydrogen sulfide, stratified layers, 1 cm muck, depleted below dark surface, and thick dark surface.

<sup>2</sup> According to the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region, Version 2.0 (Corps 2008), growing season dates are determined through on-site observations of the following indicators of biological activity in a given year: (1) above-ground growth and development of vascular plants, and/or (2) soil temperature.

### Sandy Soils

“Sandy soils” refers to soil materials with a USDA soil texture of loamy fine sand and coarser. Hydric soil indicators within this group include sandy mucky mineral, sandy gleyed matrix, sandy redox, and stripped matrix.

### Loamy and Clayey Soils

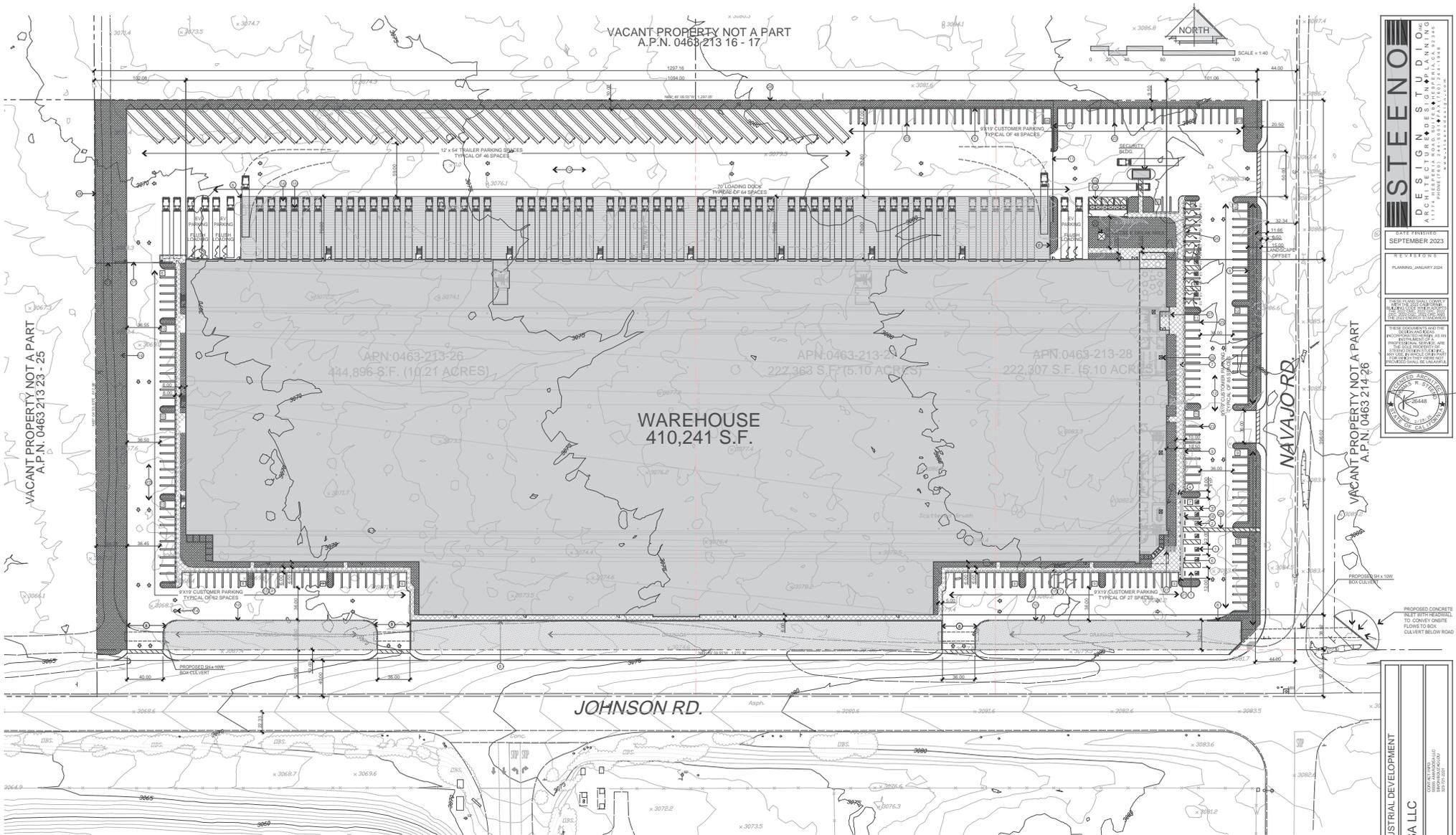
“Loamy and clayey soils” refers to soil materials with a USDA soil texture of loamy very fine sand and finer. Hydric soil indicators within this group include loamy mucky mineral, loamy gleyed matrix, depleted matrix, redox dark surface, depleted dark surface, redox depressions, and vernal pools.

## **SWANCC WATERS**

The term “isolated waters” is generally applied to waters/wetlands that are not connected by surface water to a river, lake, ocean, or other body of water. In the presence of isolated conditions, the Regional Board and CDFW take jurisdiction through the application of the OHWM/streambed and/or the 3 parameter wetland methodology utilized by the Corps.

**Appendix D      Site Plan**

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**STEENO**  
DESIGN STUDIO  
ARCHITECTURE & PLANNING  
11774 HERPERS ROAD, SUITE 100, PLEASANTON, CA 94566  
PH: 925.261.1177 FAX: 925.261.1178 WWW.STEENO.COM

DATE PREPARED: SEPTEMBER 2023  
PLANNING: JANUARY 2024

THIS PLAN SHALL ONLY BE USED FOR THE PROJECT AND SITE SPECIFICALLY IDENTIFIED HEREON. ANY REUSE OF THIS PLAN FOR ANY OTHER PROJECT WITHOUT THE WRITTEN CONSENT OF STEENO DESIGN STUDIO, INC. IS STRICTLY PROHIBITED. THE USER OF THIS PLAN SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE APPROPRIATE AGENCIES.

PROJECT: INDUSTRIAL DEVELOPMENT  
AMARGOSA LLC  
DATE: 09/20/2023  
PROJECT LOCATION: 11774 HERPERS ROAD, SUITE 100, PLEASANTON, CA 94566  
APN: 0463-213-26

**SITE PLAN**  
SCALE = 1:40

KEYED NOTES		PARKING SUMMARY		SITE DATA		PROJECT DATA		VICINITY MAP																																																																						
<ul style="list-style-type: none"> <li>① VAN ACCESSIBLE PARKING SPACE</li> <li>② ACCESSIBILITY STALL EMBLEM PAINTED AS SHOWN</li> <li>③ 6" WIDE ACCESSIBILITY ACCESS W/ BLUE STRIPES</li> <li>④ D.A. SLOPE NOT TO EXCEED 3.0% MAX SLOPE IN DIRECTION OF RUN</li> <li>⑤ WARNING SIGNAGE REGARDING UNAUTHORIZED USE OF DISABLED PARKING SPACES</li> <li>⑥ TRUNCATED DORIES, 3/8" DEPTH MIN., 6" WIDE</li> <li>⑦ 4" NOMINAL THICK CONCRETE WALKWAYS</li> <li>⑧ RETAINING WALL SEE CIVIL PLANS</li> <li>⑨ 6" WIDE CONCRETE CURB W/ 2" PARKING NOSE OVER</li> <li>⑩ 6" WIDE CONCRETE 4" CURB</li> <li>⑪ 6" HIGH WROUGHT IRON FENCE AND WROUGHT IRON ROLLING GATE COLOR BLACK W/ VISION BLOCK FACING NAVAJO RD &amp; JOHNSON RD</li> <li>⑫ PROPOSED A.C. PAVING - 4" OVER 4" CLASS 8 BASE OVER 12" OF COMPACTED SOIL</li> <li>⑬ 25' SITE LIGHT POLE STANDARD W/ 24" HIGH CONC. BASE W/ SHOE BOX STYLE FIXTURES &amp; LIGHT SHIELD TO MEET 33' FOOTCANDLE LEVELS AT ALL PROPERTY LINE</li> <li>⑭ TRAFFIC FLOW DIRECTIONAL ARROWS PAINTED ON PAVING AS SHOWN ON PLAN</li> <li>⑮ 4" FRONT PER CITY STANDARDS. SEE SHEET T-1 FOR DETAILS</li> <li>⑯ 8" THK. REINFORCED CONCRETE PAD W/ 2% MAXIMUM SLOPE AWAY FROM THE</li> <li>⑰ CONCRETE SCREED LINES IN A 5' SQUARE GRID PATTERN</li> <li>⑱ CONCRETE WHEEL STOP PER CITY STANDARD</li> <li>⑲ LANDSCAPED AREA. SEE LANDSCAPING PLANS</li> <li>⑳ ELECTRICAL TRANSFORMER BY EMSON</li> <li>㉑ 12" Ø CONCRETE FILLED BOLLARDS</li> <li>㉒ 12" WIDE STEPPING STRIP COMBINE W/ 6" CURB (18" W/ MONO POUR)</li> <li>㉓ PAINTED PARKING HARPIN STRIPE</li> <li>㉔ 4" WIDE A.D.A. PATH OF TRAVEL</li> <li>㉕ EV CHARGING STATION EQUIPMENT (TYP. 8)</li> <li>㉖ SLEAM (BR / W/POUR) EV/F PARKING IDENTIFICATION</li> <li>㉗ 200SC 5.105.5.2, TYP. OF 3</li> <li>㉘ SHORT TERM PARKING BIKE RACKS TO ACCOMMODATE 5% OF TOTAL VISITOR PARKING SPACES</li> <li>㉙ 6" METAL CHAINLINK FENCE</li> <li>㉚ A/C UNITS. SEE MECHANICAL PLANS</li> </ul>	<ul style="list-style-type: none"> <li>① 12" WIDE STEPPING STRIP COMBINE W/ 6" CURB (18" W/ MONO POUR)</li> <li>② PAINTED PARKING HARPIN STRIPE</li> <li>③ 4" WIDE A.D.A. PATH OF TRAVEL</li> <li>④ EV CHARGING STATION EQUIPMENT (TYP. 8)</li> <li>⑤ SLEAM (BR / W/POUR) EV/F PARKING IDENTIFICATION</li> <li>⑥ 200SC 5.105.5.2, TYP. OF 3</li> <li>⑦ SHORT TERM PARKING BIKE RACKS TO ACCOMMODATE 5% OF TOTAL VISITOR PARKING SPACES</li> <li>⑧ 6" METAL CHAINLINK FENCE</li> <li>⑨ A/C UNITS. 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ARCHITECT: TOM STEENO 11774 HERPERS RD. SUITE 100 PH: 760.244.5001 FX: 760.244.1948</p> <p><b>PARCEL DATA</b></p> <p><b>LEGAL DESCRIPTION:</b> PARCEL MAP 14418, P.M. 181/84-85 PARCEL MAP 14418, P.M. 181/84-85 PARCEL MAP 14418, P.M. 181/84-85</p>	
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AMARGOSA LLC  
DATE: 09/20/2023  
PROJECT LOCATION: 11774 HERPERS ROAD, SUITE 100, PLEASANTON, CA 94566  
APN: 0463-213-26

SHEET NO.: C22-A14  
SHEET NAME: SITE PLAN  
PAGE: A-0